

REMARKS

Claims 1-23 were presented for examination. In an Final Office Action dated December 11, 2003, claims 1-23 were rejected. Claims 1-23 are herein cancelled. Claims 24-45 are herein added. Note that claims 24-45 have been redrafted for clarity while maintaining similar features to claims 1-23. Such claims add no new matter. Applicants thank Examiner for examination and, Applicants now respectfully request reconsideration in light of the below remarks and allowance of claims 24-46.

In paragraph 2, Examiner rejects claims 1-23 under 35 U.S.C. § 103(a) as being anticipated by Cesar *et al.* (U.S. Patent No. 6,172,596) in view of Johnson *et al.* (U.S. Patent No. 6,067,525). Applicants respectfully traverse this rejection.

Claim 24, as amended, is directed to a supply chain network comprising one or more site data appliances with one or more types of data source equipment, one or more site servers coupled to the one or more site data appliances, and one or more data centers coupled to the one or more data appliances. The data center maps information collected from the one or more types of data source equipment to event handlers for execution responsive to an event at the one or more types of data source equipment. Advantageously, a common set of event handlers execute responsive to disparate types of data source equipment implemented around a supply chain network. On the other hand, Cesar *et al.* discloses merely an isolated base station with varying types of RF tags, while Johnson *et al.* discloses no more than an isolated computer with integrated subsystems involved in a sales process.

A. Cesar et al.

Cesar *et al.* discloses an isolated base station that communicates with various tags having different memory structures. Namely, a plurality of types of RF tags 131, 141 carry directory or tag type numbers which determines the layout of information in the tag memory. *See* Abstract. The lone base station 100, in communication with the RF tags 131, 141, includes a computer 102, a memory 104, and a single receiver/transmitter 106. Fig. 2.

However, Applicants submit *Cesar et al.* fails to suggest of disclose the invention as described in claim 24. Foremost, *Cesar et al.* is not directed to a supply chain network. The entire disclosure of *Cesar et al.* addresses an isolated base station 100 and how it communicates with RF tags 131, 141. Figures 7A and 7B, rather than illustrating a network of interconnected distribution points, illustrate a “hierarchical approach of software tag type memory mapping.” 3:16-17. For example, a good can contain memory information relevant to a food store 748, wherein the food store is a supermarket 766, and wherein the supermarket carries non perishables 778. In other words, the interconnections between blocks 748, 766, and 778 indicate different levels of a common hierarchy rather than lines for networked communication. *Cesar et al.*, in merely disclosing an isolated base station 100, provides no centralization or coordination of different types of data supply equipment. Thus, *Cesar et al.* is not directed to a supply chain network, and fails to suggest of disclose the same.

Second, whereas claim 24 recites a site data appliance capable of having with different types of data source equipment to read tags on goods, *Cesar et al.*, discloses a base station 100 with a single receiver/transmitter 106 to read RF tags 131, 141. *See e.g.*, Fig. 1. Therefore, *Cesar et al.* does not address how to configure a base station 100 to communicate with different types of receivers and/or transmitters. It follows that *Cesar et al.* does not collect specification information or event information, characteristics that makes data source equipment unique, from different types of data source equipment. Furthermore, varying RF tags 130, 140 are not comparable to varying data source equipment, as RF tags 131, 141 are different devices used to perform different functions in a different manner. Also, the variation in RF tags 131, 141 of *Cesar et al.* refers mainly to differences in their memory structures. *See e.g.*, 12:38-58 (“The tag type would then reflect which manufacturing details were recorded and where they were stored in the tag memory”). Thus, *Cesar et al.* fails to suggest of disclose a site data appliance having different types of data source equipment.

Third, whereas claim 24 recites a site server that gathers information from several site data appliances, *Cesar et al.* fails to disclose a site server. Indeed, *Cesar et al.* fails to disclose any apparatus hierarchically above the isolated base station 100. Thus, there is

no device to gather event information about more than one base station 100. Moreover, the site servers of claim 24 are functionally distinct from the base station 100 of Cesar *et al.*, since the base station 100 is only privy to local configuration information and cannot perform centralized event execution with respect to several site data appliances having different types of data source equipment. Thus, Cesar *et al.* does not suggest or disclose one or more site servers.

Fourth, whereas claim 24 recites a data center that gathers information from several site servers, Cesar *et al.* fails to disclose a data center since it fails to even disclose a site server as discussed. Nor can the memory 104 of Cesar *et al.* perform the functions of the data center as the memory 104 is part of the base station itself 100 and the data center of claim 24 can centralize communication to numerous site servers. The data center of claim 24, unlike Cesar *et al.*, also maps event handlers to event information from the different types of data source equipment, allowing the data center to uniformly execute event handlers across site servers and site data appliances. Thus, Cesar *et al.* fails to suggest or disclose a data center.

B. Johnson *et al.*

Johnson *et al.* does not cure the deficiencies of Cesar *et al.* Johnson *et al.* discloses an isolated computer that uses an event manager 201 to integrate subsystem components of a salesperson support system. More specifically, the computer “facilitates the sale of an item or service by intelligently integrating into a single system tools used by a salesperson in the sales process.” 1:5-9. An event manager provides “integration of the components of the system.” 8:34-37. Additionally, “[t]he computer automatically detects the occurrence of an event and determines the context in which an event occurs. The computer further automatically initiates an operation using another subsystem of the computer to facilitate a new event based on the context in which the first event occurred.” 2:40-43. Exemplary subsystems facilitate the sales process with pre-sales lead generation, maximizing time spent with the customer, and ensuring customer satisfaction. See Abstract. Thus, Johnson *et al.* provides a single computer to manage events in the sales process.

However, Applicants submit that Johnson *et al.* fails to suggest or disclose disclose the invention as described in claim 24. Rather than being directed to a supply chain network, Johnson *et al.* is directed to an isolated computer used by a single salesperson. The subsystems of Johnson *et al.* represent parts of the computer rather than geographically dispersed distribution points of goods. Whereas claim 24 recites a supply chain network that allows information to be accessed at different parts of the network, only the sales person using the computer in Johnson *et al.* can access information. Therefore, Johnson *et al.* does not solve the problems addressed by claim 24.

Moreover, the event information of claim 24 relates to different types of data source equipment, whereas the events of Johnson *et al.* relate only to subsystems of a sales process. Johnson *et al.* does not disclose a site data appliance to collect event information, a site server to gather specification information across data appliances and a data center to generate a mapping of event information across site servers. Instead, Johnson *et al.* relies on consistency in subsystems for recognizing new events in the context of familiar events, and cannot adapt event information to new configurations or events. Therefore, Johnson *et al.* does not suggest or disclose event information related to different types of data source equipment.

Because neither Cesar *et al.* nor Johnson *et al.* disclose the features of independent claim 24 either alone or in combination with each other or other non-cited prior art, Applicant respectfully submits that claim 24 is patentably distinct over the prior art. Furthermore, independent claims 31, 38, and 39 recite similar limitations, and thus, are patentable for at least the same reasons as claims 24. Since claims 25-30, 32-37, and 40-45 depend from claims 24, 31, 38, and 39, in addition to being patentable on separate grounds (*e.g.*, creating a Description Document), these claims are also patentable.

CONCLUSION

In sum, Applicant respectfully submits that claims 24-45, as presented herein, are patentably distinguishable over the prior art of record. Therefore, Applicants request reconsideration and allowance of these claims.

In addition, Applicant respectfully invites Examiner to contact Applicants' representative at the number provided below if Examiner believes it will help expedite furtherance of this application.

RESPECTFULLY SUBMITTED,
JOHN J. DOOLEY, *ET AL.*

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By: _____

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